

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

Jakub Madej,)	Case No. 1:21-cv-791
)	
Plaintiff,)	
)	Judge Calabrese
v.)	
)	Magistrate Judge Baughman
JPMorgan Chase N.A.,)	
)	
Defendant.)	

**DEFENDANT’S MOTION FOR EXTENSION OF TIME TO MOVE OR PLEAD IN
RESPONSE TO COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant JPMorgan Chase Bank, N.A. (“Chase” and named in the Complaint as JPMorgan Chase N.A.) hereby moves to extend the time in which Chase must move or plead in response to the Complaint to June 4, 2021. This is a 21-day extension of the current deadline to move or plead in response to the Complaint, which currently May 14, 2021. This Motion is appropriate under Federal Rule of Civil Procedure 6(1)(A) as Chase’s current deadline to move or plead in response to the Complaint has not expired.

Chase seeks this extension to allow undersigned counsel adequate time to investigate the legal and factual issues raised in the Complaint. Extending Chase’s deadline to move or plead in response to the Complaint will not affect any existing deadlines in this action, as no deadlines have been set. Undersigned counsel has been unable to reach Plaintiff to confirm whether or not Plaintiff opposes the requested extension.

WHEREFORE, for good cause shown, Chase respectfully requests that its motion be granted and that the time within which Chase must move or plead in response to the Complaint be extended to and including June 4, 2021.

May 13, 2021

Respectfully Submitted,

/s/ David J. Dirisamer
David J. Dirisamer (0092125)
BARNES & THORNBURG LLP
41 South High Street, Suite 3300
Columbus, OH 43215
614-628-1451 (Office)
614-628-1433 (Facsimile)
David.Dirisamer@btlaw.com
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed with the Court on May 13, 2021 and served on all parties of record via the Court's CM/ECF system and on the below via regular U.S. Mail:

Jakub J. Madej
415 Boston Post Rd., Ste. 3-1102
Milford, CT 06460
Plaintiff Pro Se

/s/ David J. Dirisamer
David J. Dirisamer